

FACTS**WHAT DO RETIREONE, INC. AND EF LEGACY SECURITIES, LLC DO WITH YOUR PERSONAL INFORMATION?**

Why?	Financial companies choose how they share your personal information. Federal and state law give consumers the right to limit some but not all sharing. Federal and state law also require us to tell you how we collect, share, and protect your personal information. Please read this Privacy Policy carefully to understand what we do.
What?	<p>The types of personal information we collect and share depend on the product or service you have with us. This information can include:</p> <ul style="list-style-type: none"> ▪ Name, address, social security number, income, income tax rate, net worth, financial objectives, risk tolerance and the names of beneficiaries; ▪ Information about existing insurance policies, wills, mortgages and tax returns; and ▪ Personal and household information such as spending habits, financial goals, health information and other records concerning customer financial condition. <p>When you are <i>no longer</i> our customer, we continue to share your information as described in this Policy.</p>
How?	All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons RetireOne, Inc. and EF Legacy Securities, LLC choose to share; and whether you can limit this sharing. In short, we do not share your personal information for any purpose other than to facilitate your transactions and for other everyday business purposes. You also will receive separate privacy policies from other financial companies involved with your prospective purchase or purchase of a product, which you should review carefully.

Reasons we can share your personal information	Do RetireOne, Inc and EF Legacy Securities, LLC share?	Can you limit this sharing?
For our everyday business purposes – such as to process your transaction, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	YES	NO
For our marketing purposes – to offer our products and services to you	NO	We don't share
For joint marketing with other financial companies	NO	We don't share
For our affiliates' everyday business purposes – information about your creditworthiness	NO	We don't share
For our affiliates to market to you	NO	We don't share
For nonaffiliates to market to you	NO	We don't share

Who we are	
Who is providing this Policy?	RetireOne, Inc. and its broker-dealer affiliate, EF Legacy Securities, LLC, hereafter “we” or “us” or the “Company”

What we do with your information and your rights	
How does the Company collect my personal information?	<p>We collect your personal information, for example, when you</p> <ul style="list-style-type: none"> ▪ Open an account or give us your income information; or ▪ Provide us with financial information for our review or tell us about your investment or retirement portfolio; or ▪ Buy and sell securities or make deposits or withdrawals from your account. <p>We also may collect your personal information from others, such as credit bureaus, affiliates, or other companies.</p>
How does the Company protect, store, secure and retain my information?	<p>The Company maintains strict standards for the protection, storage, security and retention of your information. For more details on how we do this, we encourage you to read our Information Security Policy RetireOne.com/security.</p> <p>We will take reasonable steps to protect your personal information against loss, theft and misappropriation, as well as from unauthorized access, copying or modification. However, no method of storage on or transmission over the internet is 100% secure, and so we cannot guarantee the absolute security of your personal information.</p> <p>The length of time we hold your personal information will vary. We retain your personal information for a minimum of five years from the date the relevant business relationship has ended. To the extent permitted by applicable law, we will retain personal information as long as it is needed for the business purpose for which it was provided, or if we have another lawful basis to retain the information.</p>
Does the Company ever transfer or disclose my information?	<p>We may share personal information with our Affiliates (defined below) for business purposes, such as but not limited to, those servicing customer accounts and informing customers about new products and services, or to aid in the trading activity of the company, its affiliates, or employees, and as permitted by applicable law. Our Affiliates may include companies controlled or owned by us as well as companies that have an ownership interest in our company. The information we share with Affiliates may include any of the information described above, such as your name, address, trading, and account information. Our Affiliates maintain the privacy of your information to the same extent the Company does in accordance with this Privacy Policy.</p> <p>To service your account and process your transactions, we may provide your information to related third parties, such as firms that assist us in servicing your account and require such information. These services include financial services and cloud storage providers. We require these service providers to protect the confidentiality of your information and use it only for the purpose of providing these services.</p> <p>We may also share your personal information with others in connection with, or during negotiations of, any merger, sale of company assets, consolidation or restructuring, financing or acquisition of all or a portion of our business by or into another company.</p> <p>The Company may share your personal information other than as described in this Policy, but only if we notify you and you consent. Note that even with your consent, you can opt out at any time from having us share your personal information.</p>
Does the Company ever share my information with third parties?	<p>The Company does not disclose your personal information to third parties, except as described in this Policy. Third-party disclosures may include sharing such information with non-affiliated companies that perform support services for your account or facilitate your transactions with the Company, including those that provide professional, legal, or accounting advice to the Company. Non-affiliated companies that assist the Company in providing services to you are required to maintain the confidentiality of such information to the extent they receive it and to</p>

	<p>use your personal information only in the course of providing such services and only for the purposes that the Company dictates.</p> <p>In order to provide you with the information or services which you have requested, your personal information may occasionally be transferred or shared with third parties who act for us for further processing in accordance with the purposes for which the data was originally collected or for purposes to which you have subsequently consented. For example, sometimes a third party may have access to your personal information in order to support our information technology or to handle mailings on our behalf.</p> <p>We will keep your contact details on our database and may, from time to time, e-mail or post your information to make you aware of our other similar products which may be of interest to you. If you do not wish to receive e-mails or posts from us for these purposes, please let us know by following the “unsubscribe” procedure set out below.</p> <p>We may share, transfer or disclose the information in our databases and server logs to comply with a legal requirement, for the administration of justice, interacting with anti-fraud databases, to protect your vital interests, to protect the security or integrity of our databases, or this website, to take precautions against legal liability, or in the event of our flotation on a stock exchange, sale, merger, reorganization, dissolution, disposal of all or part of our assets or similar event. We will inform you of any such transfer or disclosure as required by law.</p>
Does the Company website link me to other websites?	<p>Our website may contain hyperlinks to websites that are not operated by us. These hyperlinks are provided for your reference and convenience only and do not imply any endorsement of the activities of these third-party websites or any association with their operators. We do not control these websites and are not responsible for their data or privacy practices. We urge you to review any privacy policy posted on any site you visit before using the site or providing any personal information about yourself.</p>
Why can't I limit all sharing?	<p>Federal and state law give you the right to limit only</p> <ul style="list-style-type: none"> ▪ Sharing for Affiliates' everyday business purposes – information about your creditworthiness ▪ Affiliates from using your information to market to you ▪ Sharing for nonaffiliates to market to you <p>State laws and individual companies may give you additional rights to limit sharing.</p>
Does the Company collect children's data?	<p>Our services are not directed to children, and we do not knowingly collect personal information from children under the age of 18. If you believe that a child under the age of 18 has given us personal information, please contact us at service@RetireOne.com.</p>
What laws protect me if I am a resident of California, Colorado, Connecticut, Utah, or Virginia?	<p>The California Consumer Privacy Act (“CCPA”) and the California Privacy Rights Act of 2020 (“CPRPA”), plus the Colorado Privacy Act (“CPA”), Connecticut Data Privacy Act (“CDPA”), Utah Consumer Privacy Act (“UCPA”) and Virginia Consumer Data Protection Act (“VCDPA”) allow consumers in these states to opt out of certain sharing of their data.</p> <p>We do not track users over time and across apps or websites, and our website therefore does not respond to Do Not Track signals.</p>
What are my rights as a resident of California, Colorado, Connecticut, Utah or Virginia?	<p>California, Colorado, Connecticut, Utah and Virginia residents may request that the Company:</p> <ul style="list-style-type: none"> • Disclose the sources, categories, and specific pieces of personal information we have collected about them, how that information is used, and with whom the Company shares it • Disclose the purpose for collecting personal information • Disclose the categories of third parties with whom The Company shares personal information

	<ul style="list-style-type: none"> • Delete/rectify/restrict their personal information, subject to certain exceptions (right of rectification not applicable to Utah residents) • Disclose, for any “sales” of personal information, the categories of personal information collected and sold and to what categories of third parties it was sold • Opt them out of sales of their personal information (if any) or subject certain personal information to automated decision-making algorithms (not applicable to Utah residents) • Provide a copy of their personal information in a readily usable format that allows the information to be transmitted to others • Residents in these states may not be discriminated against for exercising any of the rights described above. <p>California, Colorado, Connecticut, Utah and Virginia residents may exercise these rights by contacting the Company at service@RetireOne.com.</p>																		
<p>What are the categories of data collected from California residents?</p>	<p>In general, we do not collect commercial, biometric, geolocation, sensory data, non-public education, or inferences drawn from other personal information (PI) that are regulated under California law. However, we do collect the following California regulated categories of PI from you:</p> <table border="1" data-bbox="505 751 1414 1801"> <thead> <tr> <th>Category</th> <th>Examples</th> <th>Collected</th> </tr> </thead> <tbody> <tr> <td>A. Identifiers.</td> <td>A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.</td> <td>YES</td> </tr> <tr> <td>B. PI categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).</td> <td>A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. <i>Some PI included in this category may overlap with other categories.</i></td> <td>YES</td> </tr> <tr> <td>C. Protected classification characteristics under California or federal law.</td> <td>Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).</td> <td>YES</td> </tr> <tr> <td>F. Internet or other similar network activity.</td> <td>Browsing history, search history, information on a consumer's interaction with websites, services, or advertisement.</td> <td>YES</td> </tr> <tr> <td>I. Professional or employment-related information.</td> <td>Current or past job history or performance evaluations.</td> <td>YES</td> </tr> </tbody> </table>	Category	Examples	Collected	A. Identifiers.	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.	YES	B. PI categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. <i>Some PI included in this category may overlap with other categories.</i>	YES	C. Protected classification characteristics under California or federal law.	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).	YES	F. Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with websites, services, or advertisement.	YES	I. Professional or employment-related information.	Current or past job history or performance evaluations.	YES
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<p>What information of mine has been shared for a business purpose</p>	<p>In the preceding twelve (12) months, the Company has disclosed the following categories of personal information for a business purpose with Affiliates:</p> <ul style="list-style-type: none"> • Category A: Identifiers. • Category B: California Customer Records. 																		

in the last twelve (12) months?	<ul style="list-style-type: none"> • Category C: Protected classification characteristics. • Category F: Internet or other similar network activity. • Category I: Professional or employment-related information.
How do I know about changes to this Privacy Policy?	<p>Any changes we may make to our Privacy Policy in the future will be posted on this page. We welcome comments about this Privacy Policy. If you have any questions about this Privacy Policy or any part of our service, you may contact us by e-mail to service@RetireOne.com. Please check back frequently to see any updates or changes to our Privacy Policy.</p> <p>We keep our Privacy Policy under regular review. This Policy and the policies described may be updated periodically without notice to you to address changes in our privacy practices or in applicable law, rules or regulations. We will place any updates on this web page.</p>
How do I unsubscribe from Company emails or Company mailing lists?	<p>If you no longer wish to receive e-mails from the Company and want to be removed from our electronic mailing list, please e-mail us at the address given below with “Email Unsubscribe” in the subject heading. E-mail to service@RetireOne.com. If you choose to unsubscribe from our mailing lists, we will hold your contact details on file marked so that we do not contact you again. This is so that we do not contact you if your details are subsequently provided to us by a third party.</p>
How do I opt out of providing my personal information to Company?	<p>You are not required to supply any of the personal information that we may request; however, failure to do so may result in our being unable to open or maintain your account or to provide services to you. While we make every effort to ensure that all information we hold about you is accurate, complete, and up to date, you can help us considerably in this regard by promptly notifying us if there are any changes to your personal information. If you do not wish to have your personal information disclosed to our Affiliates or other third parties as described in this Policy, please contact us via email service@RetireOne.com.</p>

Definitions

Affiliates	<p>Companies related by common ownership or control. They can be financial and nonfinancial companies including related third parties that assist us in servicing your account as part of our infrastructure.</p> <ul style="list-style-type: none"> ▪ <i>Our affiliates include the financial companies providing this Policy, RetireOne, Inc. and EF Legacy Securities, LLC.</i>
Nonaffiliates	<p>Companies not related by common ownership or control. They can be financial or nonfinancial companies.</p> <ul style="list-style-type: none"> ▪ <i>RetireOne, Inc. and EF Legacy Securities, LLC do not share with nonaffiliates so they can market to you, unless you specify consent out of which you can always opt out.</i>
Joint marketing	<p>A formal agreement between nonaffiliated financial companies that together market financial products or services to you.</p> <ul style="list-style-type: none"> ▪ <i>RetireOne, Inc. and EF Legacy Securities, LLC do not jointly market.</i>

Please note:

If you are a *new* customer, we can begin sharing your information **30 days** from the date we sent this Policy. When you are *no longer* our customer, we only continue to share your information as described in this Policy.

Questions?

If you have questions or comments about our Privacy Policy or practices, please contact us by email or mail using the contact information below.

Email: service@RetireOne.com
Address: 222 South First Street, Suite 600, Louisville, KY 40202
Telephone: 1-877-575-2742
Website: www.RetireOne.com